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NAS WHITING FIELD
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LETTER AND U S NAVY RESPONSE TO FLORIDA DEPARTMENT OF ENVIRONMENTAL
PROTECTION COMMENTS TO TECHNICAL MEMORANDUM NUMBER 3 FOR SOIL
ASSESSMENT REMEDIAL INVESTIGATION NAS WHITING FIELD FL
5/16/1995
NAVFAC SOUTHERN

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5090/13
Code 1859
16 May 95

Jim Cason
Florida Department of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399

RESPONSE TO COMMENTS, TECHNICAL MEMORANDUM NUMBER THREE, SOILS
ASSESSMENT, REMEDIAL INVESTIGATION (RI), PHASE IIA, NAVAL AIR STATION
(NAS), WHITING FIELD, MILTON, FL

Dear Jim,

Enclosed are the response to all comments received on Technical Memorandum Number 3.
Please look over the comments and let me know if they are sufficient so we can get the final in
the mail. If you have any questions or concerns, please call me at (803) 743-0341.

Sincerely,

JEFFREY R. ADAMS
Remedial Project Manager
Installation Restoration I Branch

Encl:

(1) Response to comments

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RESPONSE TO COMMENTS
Florida Department of Environmental Protection (FDEP)
RI/FS Phase IIA
Technical Memorandum No. 3, Soils Assessment
NAS Whiting Field, Milton, Florida

General Comments

1. **The TM does not describe the soil sampling and analysis within the content of postulated site models. What are the objectives of the soil sampling for each site and what data are required to confirm the site models? How does possible soil contamination relate to other contaminated media and migration pathways? This information is probably in the work plan and SAP if there is one; however, the TM appears to be untethered by a work plan or SAP. This apparent lack of context is an important flaw that should be corrected in the final document.**

The objectives of Phase IIA RI/FS soil sampling are outlined in RI Phase I, Technical Memorandum No. 6. The interrelationship of contamination at the RI/FS sites will be addressed in the RI report. Based on the USEPA RPM comments received during an RPM meeting on November 10, 1994, subsequent technical memoranda were prepared to serve only as data summary reports (see the attached minutes of Response to Comments, Phase IIA RI Technical Memorandum No. 1).

2. **The results are compared to presumed background concentrations and CRQLs and CRDLs. This may be acceptable at this stage of the project as a rough assessment of soil contamination in order to identify a simple ordinal ranking of "not so dirty" to "very dirty". When the Navy is ready to analyze the data fully, however, consensus on background values will be required, ARARs will be identified, and protective risk-based concentrations will be calculated, if necessary.**

Comments noted.

3. **Note that the Department has developed Soil Cleanup Goals for selected chemicals that it considers to be minimum values for site assessment and cleanup unless other values are approved. Selection of analytical methods and detection limits in the future should consider Department Soil Cleanup Goals to the extent practicable. (There are Soil Cleanup Goals for a subset of constituents that are below MDLs for approved analytical methods. In these cases, the MDL or site-specific background value may be substituted for the Soil Cleanup Goal with approval from the Department). Although ground water is not addressed by this TM, the Navy should also be aware of the Department's Ground Water Guidance Concentrations.**

Comments noted. FDEP generic soil cleanup goals were not yet available for many of the target analytes at the initiation of this project. Site-specific soil cleanup goals will be determined based on the results of individual risk assessment per site.

4. **At the other end of the report, the results and findings section simply presents the sifted data without any analysis. How do the data support or change the site models? How does the detected contamination relate to other media and migration pathways (e.g., surface water)?**

RESPONSE TO COMMENTS (Continued)
Florida Department of Environmental Protection (FDEP)
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Are the data gaps adequately filled so the Navy can begin to make site management decisions? Does the Navy need to collect more data? Are there opportunities for implementation of early actions to reduce risks at specific sites? The results and findings section should provide conclusions that begin to address these types of questions consistent with the work plan and SAP goal and objectives.

Comments noted. Technical Memorandum was intended to provide only a summary of the data collected in the Phase IIA RI/FS program (see the attached minutes of Response to Comments, RI Phase IIA Technical Memorandum No. 1). Interpretation of these results will be in the RI report. Data gaps have been addressed in Technical Memorandum No. 7, RI Phase IIB Workplan. Site management decisions will be presented in another document: Site Management Plan, NAS Whiting Field. Both documents will be forwarded for review upon completion.

Specific Comments

5. Xsum/pg iii:

Typo: "Crash that Crew Training Areas".

Comment noted. The word "that" has been deleted.

6. Section 1.0/pg. 1-1:

Identify the work plan that the various field activities are based on and briefly summarize its scope of work.

Agree. A paragraph has been added to the text to identify the workplan and the scope of work.

7. Section 2.0/pg. 2-1:

Bulleted items: what is the difference between:

"• subsurface soil sampling," and

"• soil borings and subsurface soil sampling."

Comment noted. The repetitions have been deleted from the text.

8. Section 2.2/pg. 2-3:

"The background surface soil samples were collected from locations that were not likely to be affected by past or present waste disposal practices."

Please identify the "present waste disposal practices" referred to. If these are unpermitted, uncontrolled waste disposal practices, the Navy would like to take immediate action to correct them.

Comment noted. ABB-ES is not aware of any present waste disposal practices at NAS Whiting Field that are not permitted.

RESPONSE TO COMMENTS (Continued)
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9. **Section 2.4/pg. 2-22:**
Reference to "ABB-ES, 1993b" is incorrect. The actual document being referred is Technical Report, Soil Gas Survey, March 1993, I think.

Agree. Appropriate correction has been made.

10. **Section 2.5/pg. 2-30:**
"...because they are being assessed under the Navy UST program."
In general, the Department recommends to the Navy that the IR and UST programs at Whiting coordinate their technical activities to the extent possible in order to maximize the value of their mutual environmental monitoring data. Data from one program may enhance the other and prevent the duplication of effort and expense.

Comment noted.

11. **Section 3.1.2/pg. 3-2 and Section 3.1.3/pg 3-3:**
Briefly define a "field event" and "matrix" for QA/QC purposes.

Agree. Definitions have been included in Section 3.1.2 and 3.1.3 of the revised text.

12. **Section 3.3.4/pg. 3-23:**
Narrative says "...greater than 90 percent.." and Table 3-3 indicates "> 95" completeness. Were there any key samples where data was rejected regardless of the overall data completeness?

The ">95" refers to the observed completeness parameter but has been changed to reflect the statement in the text.

There were no cases of widespread data rejection for any particular sample.

13. **Section 3.4:**
Narrative says "Some contamination was present in some of the field laboratory blank samples, and environmental results were amended to reflect this bias."
Please explain "results were amended". According to EPA and NEESA guidelines for data validation, results may not be corrected by subtracting any blank values. Perhaps you are referring to the 5X or 10X rules?

Yes, we are referring to the 5X or 10X rules on pages 64, 65, and 66 of "Sampling and Chemical Analysis Quality Assurance Requirements for the Navy Installation Restoration Program" (NEESA, 1988). The word "amended" has been replaced by "qualified" to reflect the intended meaning of the statement.

RESPONSE TO COMMENTS (Continued)
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14. **Section 3.0:**

Note that the CLP CRQLs and CRDLs for water reported in this section are higher than Florida Ground Water Guidance Concentrations for some constituents.

Comment noted. CRDLs and CRQLs were provided for informational purposes only. Analytical results for groundwater samples will be addressed in Technical Memorandum No. 5. The laboratory analytical results for groundwater are generally reported below the CRDLs and CRQLs but above the method detection limit which allows comparison to Florida Groundwater Guidance Concentrations.